

**Statement of Charles Buckley
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**Before the Committee on Public Safety and Security
State of Connecticut
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My name is Charles Buckley, Executive Vice President and General Manager of Transgas Incorporated of Lowell, Massachusetts. I have been employed by Transgas for nearly 14 years and have responsibilities for all aspects of its operations. In addition, I have 25 years experience in the operations of LNG facilities and natural gas systems. Transgas is an over the road transporter of LNG and operates a fleet of over 50 LNG trailers primarily in New England in service to local gas companies who use LNG to serve their customers on the coldest days of the winter.

I appreciate the opportunity to offer this testimony to you in connection with Raised Bill No. 1008, "An Act Concerning a Study of Liquefied Natural Gas Tanks on Trucks," and Raised Bill No. 1009, "An Act Concerning Technical Changes to Title 29 to Incorporate the State Fire Prevention Code."

The purpose of Raised Bill No. 1008 is to authorize a study to determine if existing regulations apply to LNG cargo tank vehicles, and whether existing law sufficiently protects the public.

LNG highway transportation is comprehensively and adequately regulated by the government and the rules and regulations do protect the public. The transportation of LNG is safe. Transgas has been transporting LNG on the highway since 1969. We safely transport approximately 10,000 loads of LNG each year, most of which are for destinations in New England.

All aspects of the transportation of LNG by highway have been regulated for many years by the U.S. Department of Transportation (USDOT) under Title 49 of the Code of Federal Regulations, Parts 107 through 180. These regulations are administered by the Pipeline and Hazardous Material Safety Administration ("PHMSA") of the USDOT and enforced by them as well as by other law enforcement personnel, including those in the State of Connecticut. Among the requirements covered under these parts are the following:

- All hazardous material carriers including LNG trucking companies must register with the USDOT (Part 107)
- All LNG carriers must report certain hazardous material incidents to the USDOT by telephone and follow up with a detailed written report. (Part 171)

- Cargo tanks carrying LNG must be marked with a specific red diamond shaped placards and the proper shipping name to indicate that LNG is being carried inside. (Part 172)
- Initial and recurrent driver training requirements, emergency response information and the requirement for a hazardous material safety plan are also covered. (Part 172)
- The design, construction, operating parameters and testing requirements for the trailers (Parts 173, 177, and 178)
- LNG trailers operated by Transgas meet US DOT MC-338 requirements. These trailers are built of double wall construction with aluminum inner vessels and an outer jacket of steel. The inner tank is insulated with super insulation or fiberglass wool and perlite. The annular space between the two walls is maintained in a high vacuum to provide for an effective insulation system to keep the LNG cold. The construction of the trailers is robust and among the most rugged in the trucking industry. (178.338)
- The inspection, maintenance, testing and record keeping for LNG cargo tanks (Part 180)

In addition, the Federal Motor Carrier Safety Administration (“FMCSA”) of the USDOT administers a host of regulations that pertain to all trucking companies including LNG carriers. These regulations are also contained in Title 49 of the Code of Federal Regulations and are specified in Parts 40 through 399. Among the areas covered are:

- Drug and alcohol testing procedures (Part 40)
- Commercial driver’s license standards (Part 383)
- Controlled Substances and Alcohol Testing (Part 382)
- Safety Fitness Procedures and the Hazardous Material Safety Permit (Part 385)
- Driving of commercial motor vehicles (Part 392)
- Hours of Service of Drivers including the length of a driver’s working shift and work week. (Part 395)
- Inspection, repair and maintenance including keeping of records for maintenance, driver vehicle inspection and associated reports. (Part 396)
- Transportation of hazardous materials and driving and parking rules (Part 397)

Finally, the transportation and handling of LNG within the confines of a gas company are regulated by the Connecticut Department of Public Utility Control.

As can be seen from the foregoing, there is a comprehensive and adequate body of regulations that govern the transportation of LNG on the highway and the equipment used in that transportation.

With respect to Raised Bill no. 1009, I note that Section 9 of the Bill requires the inspection by the local fire marshal of cargo tank motor vehicles containing LNG that are registered in the State of Connecticut. LNG trailers are already subject to inspection by State of Connecticut law enforcement personnel through roadside inspections and inspections that take place on Connecticut truck scale stations.

I appreciate the opportunity to present this testimony to the Committee.